

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 7

BEGUM S. NASSA,

Case No.: 23-42961-nhl

Debtor.

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**AFFIDAVIT OF NO ADVERSE INTEREST**

STATE OF NEW YORK )  
                        ) ss.:  
COUNTY OF SUFFOLK )

Avrum J. Rosen, being duly sworn, deposes and says:

1. I am a member of the Law Offices of Avrum J. Rosen, PLLC (“AJR”) and make this affidavit in support of the application of Debra Kramer, the Chapter 7 Trustee (the “Trustee”) for the Estate of Begum S. Nassa (the “Debtor”), for an order authorizing the Trustee to retain AJR as counsel to the Trustee in this case, effective as of December 11, 2023.
2. I am admitted to practice before this Court. I have over thirty-five (35) years of legal experience in the bankruptcy field and bankruptcy law presently constitutes eighty-five (85%) percent of AJR’s practice.
3. The undersigned has read and is generally familiar with Title 11 of the United States Code, together with current amendments, the Federal Rules of Bankruptcy Procedures, the E.D.N.Y. Local Bankruptcy Rules and this Court’s Chamber’s Rules.
4. The undersigned is competent to represent the interest of the Trustee in all proceedings now pending or which may reasonably be expected.
5. In preparation of drafting this affidavit, the undersigned reviewed the time records and computer records of AJR, and performed a conflict search under the name of the Debtor and

scheduled creditors of the Debtor's estate. Based upon that review, the undersigned determined that AJR does not hold or represent an interest adverse to the Trustee, the Debtor, the estate, creditors, or any other interested person with regard to the matters for which AJR is being retained, and is disinterested as that term is defined in 11 U.S.C. § 101(14).

6. As the result of inquiries, affiant believes that AJR and the undersigned have no connection with the Debtor or any of the Debtor's creditors, or any other party in interest or their respective attorneys.

7. The undersigned and AJR shall not share any of the fees earned in this matter with any other firm or attorney.

8. Pursuant to AJR's office policies, it reviews the billable hourly rates for all of its attorneys during the course of the year. During the course of the year, AJR reserves its rights to increase its billable hourly rates. In the event that AJR does increase its billable hourly rates, it shall provide notice to: (i) the Trustee; (ii) the Court; and (iii) the Office of the United States Trustee.

9. Currently, AJR, formerly known as Rosen & Kantrow, PLLC, has been retained by the Trustee in a number of matters which are pending before the Court. A list of the current pending cases is detailed herein. The cases may be in various stages ranging from initial investigation, to prosecution of adversary proceedings, to final report, or collection. The cases are:

In re Acme American Repairs, Inc., 17-42978-nhl  
In re Commercial Kitchen Designs, Inc., 17-42981-nhl  
In re Salem, 19-43048-nhl  
In re East Coast Envelope & Graphics, LLC, 20-41023-ess  
In re Lucas, 20-41537-nhl  
In re Ng, 20-42050-jmm  
In re Smallwood, 20-42708-nhl  
In re Alba, 20-43558-ess  
In re Aviles, 21-41028-ess  
In re Morshed, 21-41293-ess

In re Fenelon, Jr., 21-42071-jmm  
In re Santopietro, Jr., 21-42384-ess  
In re Mikhail Kats and Veronika Kats, 21-43138-nhl  
In re 114 Macon LLC, 21-42382-nhl  
In re 146 Ross, LLC, 22-40818-nhl  
In re Cunalata, 22-40549-nhl  
In re Seth R. Appelbaum and Alyssa B. Friedman, 21-41889-jmm  
In re Natan Gozman *dba* NG Knights Enterprises LLC, 22-40300-jmm  
In re Balkany, 2-41041-nhl  
In re Bachan, 22-40819-nhl  
In re Nutropia, Inc., 23-40189-jmm  
In re Trotta, 22-42918-nhl  
In re Shaub, 23-40523-nhl  
In re Elmhurst Assets LLC, 23-41723-nhl  
In re 10 Deep Clothing, Inc. *d/b/a* 10. Deep Clothing Inc.  
*d/b/a* 10. Deep Clothing, Inc., 22-41733-ess  
In re Murray, 23-42484-jmm

10. It is anticipated that compensation will be paid to AJR, as counsel to the Trustee, from the Debtor's estate upon proper application thereof. AJR's current billing rates are as follows:

Partner	\$670.00 per hour
Associates	\$395.00 – \$570.00 per hour
Paraprofessionals	\$150.00 – \$200.00 per hour

/s/ Avrum J. Rosen  
Avrum J. Rosen

Sworn to before me this  
11<sup>th</sup> day of December, 2023

/s/ Deborah Dobbin  
Deborah Dobbin  
Notary Public State of New York  
Qualified in Nassau County  
No. 02DO5056227  
Commission Exp. 3/04/2026